

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

GUZEL GANIEVA,

Plaintiff,

v.

LEON BLACK,

Defendant.

Index No. 155262/2021

IAS Part 58 (Cohen, J.)

STIPULATION AND ORDER

WHEREAS, on November 12, 2021, the Court entered a Preliminary Conference Order;

WHEREAS, on January 14, 2022, the Court entered a so-ordered stipulation extending certain deadlines in the Preliminary Conference Order;

WHEREAS, on February 22, 2022, the Court held a compliance conference and verbally extended other deadlines in the Preliminary Conference Order;

WHEREAS, on April 28, 2022, the Court held a compliance conference and, in light of the Court's forthcoming decisions on the parties' pending motions, scheduled a conference for May 25, 2022, at which time the Court would re-set discovery deadlines. The Court further directed the parties to file a stipulation temporarily extending the Note of Issue deadline to a date after the upcoming conference;

WHEREAS, on April 28, 2022, the parties filed a stipulation extending the Note of Issue deadline to May 26, 2022;

WHEREAS, on May 19, 2022, Ms. Ganieva filed a motion to compel, which motion is currently returnable on June 6, 2022;

WHEREAS, on May 23, 2022, Mr. Black filed a motion pursuant CPLR 3211(a)(1), (a)(5), and (a)(7) to dismiss the Second Amended Complaint, which motion stayed all discovery pursuant to CPLR 3214(b) until and unless the Court orders otherwise;

WHEREAS, on May 25, 2022, the Court rescheduled the compliance conference for September 20, 2022; and

WHEREAS, for the reasons stated above, the Parties wish to extend the Note of Issue deadline and set provisional deadlines to govern discovery if needed.

NOW THEREFORE, the parties hereby stipulate and agree that:

1. The return date for Ms. Ganieva's motion to compel, currently scheduled for June 6, 2022, shall be extended to June 13, 2022. The deadline for Mr. Black's opposition, currently scheduled for May 31, 2022, shall be extended to one week after such time as the stay of discovery under 3214(b) is lifted and the case is not dismissed. The motion will be placed in abeyance until that time. The parties shall enter a stipulation setting a new return date, if necessary, at such time that the stay is lifted and the case is not dismissed.

2. The deadline for the completion of document discovery shall be extended to April 28, 2023.

3. The deadline for completion of party depositions shall be extended to April 28, 2023.

4. The deadline for impleader shall be extended to May 26, 2023.

5. The Court shall hold a compliance conference on June 15, 2023, or a date thereafter at the Court's convenience.

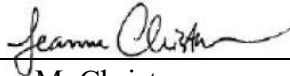
6. The Note of Issue deadline shall be extended to July 28, 2023.

7. The deadline for dispositive motions shall be extended to December 1, 2023.

8. The parties reserve all rights to seek further extensions of these deadlines.
9. The parties understand that the Court may set new discovery deadlines at a later date, including at the compliance conference on September 20, 2022, or after the Court decides Mr. Black's motion to dismiss the Second Amended Complaint.
10. No previous requests have been made for the relief sought herein.

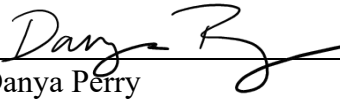
Dated: May 26, 2022

New York, New York

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Attorneys for Defendant Leon Black

Date: May 31, 2022

SO ORDERED:


HON. DAVID B. COHEN^{J.S.C.}
J.S.C.

Hon. David B. Cohen, J.S.C.